

1 AARON D. FORD  
2 Attorney General  
3 Jamie Stilz (Bar No. 13772)  
4 Deputy Attorney General  
5 State of Nevada  
6 Office of the Attorney General  
555 E. Washington Ave., Ste. 3900  
Las Vegas, Nevada 89101-1068  
(702) 486-3130 (phone)  
(702) 486-2377 (fax)  
JStilz@ag.nv.gov  
*Attorneys for Respondents*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

XIAO YE BAI,  
Petitioner,  
vs.  
STATE OF NEVADA, *et al.*,  
Respondent

Case No. 2:20-cv-02042-KJD-NJK

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
REPLY IN SUPPORT OF MOTION TO  
DISMISS (ECF NO. 53)**

**(SECOND REQUEST)**

Respondents move this Court for an enlargement of time of 14 days from the current due date of February 28, 2022, up to and including March 14, 2022, in which to file their Reply in Support of the Motion to Dismiss (ECF No. 53). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: February 28, 2022.

Submitted by:

AARON D. FORD  
Attorney General

By: /s/ Jaimie Stilz  
Jaimie Stilz (Bar. No. 13772)  
Deputy Attorney General

**DECLARATION OF JAIME STILZ**

STATE OF NEVADA )  
COUNTY OF CLARK ) ss:

I, JAIME STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Xiao Ye Bai v. State of Nevada, et al.*, Case No. 2:20-cv-02042-KJD-NJK, and as such, have personal knowledge of the matters contained herein.

2. This is my second request for an extension to file the Reply in Support of the Motion to Dismiss (ECF No. 53), and this Motion is made in good faith and not for the purpose of delay.

3. The Reply is currently due on February 28, 2022.

4. I am unable with due diligence to timely complete the Reply herein. I have been dealing with pressing medical/health issues and have recently had an unexpected death in my family. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Reply in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. I have spoken to counsel for Bai, and he does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 14 days, up to and including March 14, 2022, to file the Reply in Support of the Motion to Dismiss (ECF No. 53).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28<sup>th</sup> day of February, 2022.

/s/ Jamie Stilz  
Jamie Stilz (Bar No. 13772)  
Deputy Attorney General

## IT IS SO ORDERED:

*Kerry D.*

UNITED STATES DISTRICT JUDGE

Dated: March 1, 2022